

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

APR 1 7 2012

REPLY TO THE ATTENTION OF:

WC-15J

CERTIFIED MAIL 7009 1680 0000 7669 3622 RETURN RECEIPT REQUESTED

Adam Burley, President Kennecott Eagle Minerals Company 504 Spruce Street Ishpeming, Michigan 49849

Subject: November 1, 2011 Inspection of Kennecott Eagle Minerals Company, Bovine Igneous Complex, Baraga County, Michigan

Dear Mr. Burley:

Please find enclosed a copy of the report generated as a result of the Kennecott Eagle Minerals Company (Kennecott), Bovine Igneous Complex (BIC) site inspection conducted by the U.S. Environmental Protection Agency on November 1, 2011. The purpose of this report is to evaluate and document compliance of Kennecott's exploratory operations at the BIC site, and to determine whether Kennecott was required to obtain a Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) for these activities.

During the inspection, we found an issue of concern; this is described in the enclosed report. Please provide a written response to the issue identified in the report within 30 days. In your response, please include a description of corrective actions taken. Your response should be mailed to:

Newton Ellens, Water Division, EPA Region 5 77 W. Jackson Blvd. (WC-15J) Chicago, Illinois 60604-3590 If you have any questions or concerns regarding this letter, or the inspection report, please contact Newton Ellens at 312-353-5562 or at <u>ellens.newton@epa.gov</u>. Your cooperation in this matter is appreciated.

Sincerely,

Barbara VanTil, Chief

Water Enforcement & Compliance Assurance

Section #1

Enclosures

cc: Warren Chris Swartz, Jr., President

Keweenaw Bay Indian Community

CWA INDUSTRIAL STORMWATER INSPECTION REPORT U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose:

Stormwater Inspection for Metal Mining Facility

Company:

Kennecott Eagle Minerals Company

504 Spruce St.

Ishpeming, MI 49849

Facility:

Bovine Igneous Complex

Township 50N, Range 32W, Section 19

Baraga County, MI

Date of Inspection:

November 1, 2011

EPA Representative:

Newton Ellens, Environmental Engineer, 312-353-5562

Facility Representative:

Andrew Ware, Exploration Manager, 906-869-2134

Report Prepared by:

Newton Ellens, 312-353-5562, ellens.newton@epa.gov

Report Date: April 17, 2012

Inspector's Signature: Newton Ellem

BACKGROUND

The purpose of this report is to evaluate and document compliance of Kennecott Eagle Minerals Company's (Kennecott) exploratory operations at the Bovine Igneous Complex (BIC) site, and to determine whether Kennecott was required to obtain a Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) for these activities.

The Keweenaw Bay Indian Community (KBIC) sent a September 21, 2011 letter to the U.S. Environmental Protection Agency (Attachment A). KBIC stated its concerns about Kennecott's mineral exploration core drilling activities at the BIC site, which is located within the boundaries of KBIC's reservation. Specifically, KBIC stated that Kennecott has not obtained an MSGP, as required, for its activities. EPA told KBIC that it needed to determine the acreage of Kennecott's land-disturbing activities as part of a determination of whether Kennecott is required to obtain an MSGP; if Kennecott has disturbed one acre or more, then it may be required to obtain an MSGP. The activities may be classified under Sector G of the MSGP (Metal Mining—Ore Mining and Dressing). EPA decided to conduct an inspection at the BIC site after EPA representatives received KBIC's letter and discussed the matter with KBIC representatives.

SITE INSPECTION

Charles Brumleve from KBIC led me to the BIC site because it is difficult to find. Mr. Brumleve left soon afterwards, however, and he did not participate in the inspection. I met Andrew Ware at the BIC site, showed him my credentials, and explained the purpose of my inspection. I only saw Mr. Ware at the site. I saw no activity, machines, or vehicles (aside from mine and Mr. Ware's) at the site. The only drilling evidence I saw were drill pads and drill casings sticking aboveground. I asked Mr. Ware to describe the background of the drilling operation. Mr. Ware told me that Kennecott started exploratory work at the site in 1995. In terms of ownership:

- 1. Kennecott owns the surface and mineral title of approximately the western half of the BIC site.
- 2. A private family owns the surface and mineral title of approximately the eastern half of the BIC site. The family leases the property to Kennecott.
- 3. KBIC owns the surface title of approximately one quarter of the southern portion of the BIC site. However, Kennecott owns the surface minerals of this land.

Mr. Ware said that Kennecott conducted drilling campaigns at the BIC site during the following years:

- 1. 1995
- 2. 2000
- 3. 2001
- 4. 2002
- 5. 2006
- 6. 2007

- 7. 2008
- 8. 2010
- 9. 2011

Mr. Ware said that Kennecott drilled a total of 62 holes at the BIC site. Kennecott constructed a number of drilling pads, and drilled one or more holes at each pad. Most of the roads constructed at the BIC site were constructed by a logging company. Kennecott used these logging roads to access sites for drilling. Mr. Ware said that Kennecott only constructed 200 feet of road at the BIC site. Mr. Ware said that Kennecott is winding down activity at the BIC site for the season; it is harder to access the site in wintery weather.

I asked Mr. Ware for data on the acreage of land disturbance for Kennecott's drill pads and road construction. Mr. Ware responded that he did not have that information with him, and he requested me to send Kennecott a written request for that information.

I stated that EPA would evaluate whether the areas of the drill pads at the BIC site should be added together (as part of one project, or common plan of development), or if each drill pad should be characterized as a separate project. This is important since that evaluation informs EPA's determination of whether Kennecott must obtain an MSGP for the BIC site. Mr. Ware said that all of the drill pad areas are part of one project. I said that if all of Kennecott's land disturbing activities at the BIC site total one acre or more, then Kennecott must obtain an MSGP for the site. We discussed whether the area of Kennecott's land disturbing activities subject to an MSGP would include land disturbed before the effective date of the MSGP (September 29, 2008). I told Mr. Ware that I would get back to him on this issue.

I asked Mr. Ware about Kennecott's best management practices during construction to prevent stormwater pollution. Mr. Ware said that Kennecott uses silt fencing during construction. Also, Kennecott doesn't drill next to a creek (if possible). Mr. Ware said that Kennecott would like to avoid the permitting process associated with this activity.

Mr. Ware explained the drilling process to me. Workers clear an area beside a road and set up a drill. They drill holes at different downward angles from one spot. The workers drill through alluvium near the surface until reaching bedrock. Then workers set a casing in the hole; the top of the metal casing is visible at the surface. Next, workers drill into the bedrock using a smaller diameter drill rod. Current drilling depths at the BIC site range from 20 to 700 meters.

Mr. Ware stated that the BIC site is not economically viable to mine. So far, the site has widespread low-grade mineralization. Kennecott left six of the existing drill holes open—perhaps for deeper drilling or geophysical testing--electrical testing for sulfides below the surface. Kennecott filled the other drill holes with cement. Per Michigan Department of Environmental Quality (MDEQ) rules workers then pull woody debris back over the exposed pad (without seeding), and allow natural vegetation to re-take the area.

Each of the drill holes at the BIC site has an identification number. Mr. Ware provided the

following suffix numbers, based upon the year drilling began:

Year	Drill Hole Suffix Numbers
2006	001 - 025
2007	026 - 035
2008	036 - 050
2011	051 - 057

While driving through the BIC site, we stopped at drill pads so that I could take pictures. The photos are provided in Attachment B. Kennecott labels each drill hole in the following format:

Where "Year" is the year the hole was drilled. Mr. Ware gave estimates of drill pad surface areas; he said that he would provide more accurate values in response to an information request:

Picture Number	Drill Hole Numbers	Estimated Area (square feet)	Description
1	11 – BIC – 056 11 – BIC – 057	8712	There is some exposed dirt covered with logs, boulders and hay.
2	06 – BIC – 001 06 – BIC – 002	600	
3 through 8	11 – BIC – 051 through 11 – BIC - 055	8712	It is a leafy logging deck, a cleared area with exposed dirt and tire tracks.
9	unidentified	8712	Unidentified drill site. It is a vegetated logging deck.
10	06 – BIC - ??	600	Three holes on unidentified leafy, gravelly pad.
11	unidentified		Unknown leafy and vegetated drill pad.
12	unidentified		Unidentified leafy and vegetated drill pad.
13	?? – BIC – 19 ?? – BIC – 20	800	Unidentified leafy vegetated drill pad, with uprooted tree stumps.
14 and 15	unidentified	500	Muddy drill pad with tire tracks.
20	unidentified		Unidentified, vegetated

1 *11	1
drill	nad
CILLII	pull

Mr. Ware paced the length of the road connecting two drill pads (between the pads photographed as Pictures 13 and 14). Kennecott constructed this road, according to Mr. Ware. Mr. Ware estimated the length of the road to be 202 yards, and the width to be 5 yards.

Mr. Ware told me that Kennecott constructed a sump drill near drill holes 11 - BIC - 056 and 11 - BIC - 057. The sump collected all water and cuttings used in the drilling process. After Kennecott finished using the sump, Kennecott sucked the water out of the sump and shipped it to K.I. Sawyer wastewater treatment plant. Kennecott then added lime to the remaining slurry in the sump. The mixture of water and slurry would harden; Kennecott sent this substance to Hickory Meadows Landfill in Wisconsin. Mr. Ware said that MDEQ requires this type of disposal for the sump water and slurry if:

- 1. Kennecott has at least 60 drill holes in a set area, or
- 2. The material in the drill holes contain at least 5% sulfide by volume.

Generally, Kennecott disposes of all of its sump water and slurry as a best management practice, regardless of MDEQ requirements.

Mr. Ware showed me a beaver dam and wetland next to the BIC site access road (Attachment B, Pictures 16 through 19). Kennecott formerly used another road to access the site. KBIC purchased that road, and asked Kennecott to stop using it. Therefore, Kennecott chose to use the present access road by the beaver dam and wetland. Before using the road, however, Kennecott had to conduct necessary repairs. As part of those repairs, Kennecott had to construct a culvert. Kennecott applied for a permit for culvert construction from MDEQ in 2006.

EXIT BRIEFING

I told Mr. Ware that I would have to wait for Kennecott to send data about when it constructed drill pads at the BIC site, and the area of those sites, before EPA could determine whether Kennecott is required to obtain a MSGP for the project.

I said that I did not see evidence of erosion from the BIC site. However, I told Mr. Ware that he should consider implementing certain erosion and sediment controls at the site (e.g., seeding exposed soil to stabilize it, or using silt fencing). If the BIC site is subject to an MSGP, then Kennecott would be required to install such controls. Mr. Ware responded that Kennecott may implement such controls at the BIC site, even if EPA doesn't determine that the site is subject to an MSGP. For example, Mr. Ware said he'd consider installing rock berms at the sides of a road which crosses an intermittent stream.

I asked Mr. Ware to describe what materials Kennecott stores at the BIC site, and how Kennecott controls spills. Mr. Ware stated that Kennecott stores cement, drilling mud, diesel fuel, and hydraulic oil onsite. Kennecott has a SPCC (spill prevention, control, and countermeasures) plan. Kennecott conducts the following practices under its SPCC:

- 1. Kennecott keeps two 55-gallon drums and waste rags onsite during drilling.
- 2. Kennecott has contractor contacts for spills which exceed its cleaning capability.
- 3. Sixty-mil HDPC plastic is placed beneath rigs to capture any fluids.
- 4. All mobile vehicles are placed over a catchment.
- 5. Containers of hydraulic oil are placed over a catchment.

I told Mr. Ware that I would send Kennecott this inspection report. Based upon information submitted by Kennecott, EPA would determine whether Kennecott was required to apply for an MSGP for the BIC facility. I also gave Mr. Ware a copy of the MSGP for his information.

POST-INSPECTION CORRESPONDENCE

Mr. Ware sent me a November 15, 2011 e-mail (Attachment C). The e-mail is a list of holes drilled at the BIC site by year. The list includes information about the year holes were drilled, the hole identification numbers, the number of holes drilled, and the location of the holes. The number of holes listed in the e-mail (69) is greater than the number of holes Mr. Ware told me about during the inspection (62).

Drill Pad or Roadway	Area, as provided by Kennecott	Area in square feet
11 – BIC – 056 11 – BIC – 057	0.2 acre	8712
06 – BIC – 001 06 – BIC – 002	600 square feet	600
11 – BIC – 051 through 11 – BIC - 055	0.2 acre	8712
unidentified	0.2 acre	8712
06 – BIC - ??	600 square feet	600
?? – BIC – 19 ?? – BIC – 20	800 square feet	800
unidentified	500 square feet	500
Kennecott-constructed roadway	202 yards x 5 yards = 1010 square yards	9090
TOTAL		37,726 sq ft (0.87 acre)

This initial information does not show that Kennecott must apply for an MSGP, since this total falls below 1 acre (43,560 square feet).

Mr. Ware sent me a January 11, 2012 e-mail (Attachment D). The e-mail includes an attached spreadsheet with the following information:

1. drill hole identification numbers,

- 2. drill pad construction, usage, and re-opening dates (if applicable),
- 3. drill pad identification numbers,
- 4. drill pad status,
- 5. open drill pad area,
- 6. reclaimed drill pad area, and
- 7. area of rehabilitated and constructed roads

According to the spreadsheet, the total area of disturbance from roads and drill pads construction after September 2008 equals 3000 square feet.

COMPLIANCE ISSUES

EPA has determined that the MSGP will apply to activities at the BIC if Kennecott disturbs at least one acre of land at the BIC site after the effective date of the MSGP (September 29, 2008). In this case, Kennecott disturbed 3000 square feet of land after September 2008. Three thousand square feet of disturbance is below the one acre threshold (43,560 square feet) for MSGP applicability. Therefore, Kennecott is not required to obtain an MSGP for its exploratory activities at the BIC site. However, if future mining activities will cumulatively result in Kennecott disturbing at least one acre of land at the BIC site after September 29, 2008, then Kennecott must obtain an MSGP.

CONCERNS

As stated above, Kennecott should consider whether to implement erosion and sediment controls for disturbed land at newer drill pads (e.g., seeding exposed soil, silt fencing, or rock berms).

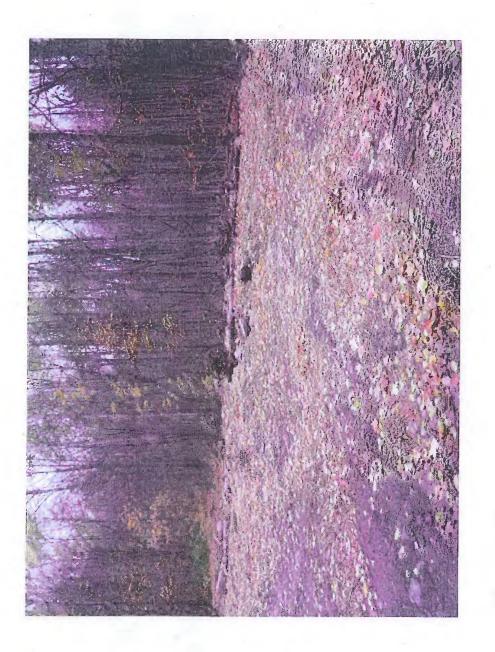
LIST OF ATTACHMENTS

- A. September 21, 2011 letter from the Keeweenaw Bay Indian Community to the EPA
- B. Photos taken during the November 1, 2011 Inspection of the Bovine Igneous Complex, Baraga County, MI
- C. November 15, 2011 e-mail from Andrew Ware, Kennecott Eagle Minerals Company to Newton Ellens, U.S. Environmental Protection Agency
- D. January 11, 2012 e-mail from Andrew Ware, Kennecott Eagle Minerals Company to Newton Ellens, U.S. Environmental Protection Agency

Attachment B

Photos taken during an Inspection of the Bovine Igneous Complex, Baraga County, MI

Photos taken by Newton Ellens November 1, 2011



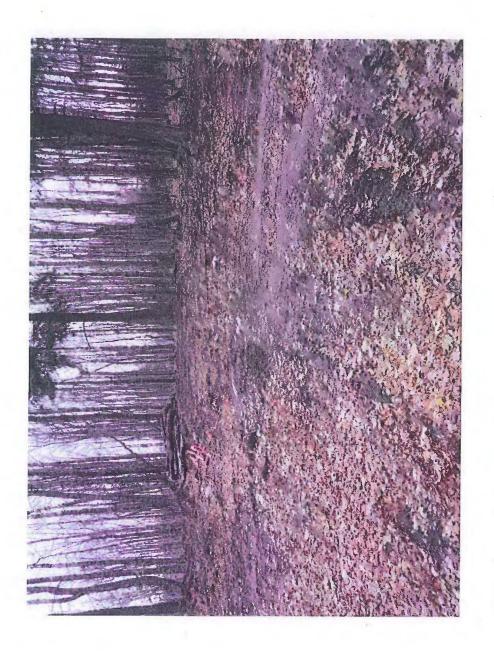
Picture 1 (IMGP0005.jpg)

estimated at 0.2 acre. There is some dirt exposed, covered with logs, Pad for drill holes #11 - BIC - 056 and 11 - BIC - 057. The drill pad is boulders and hay.



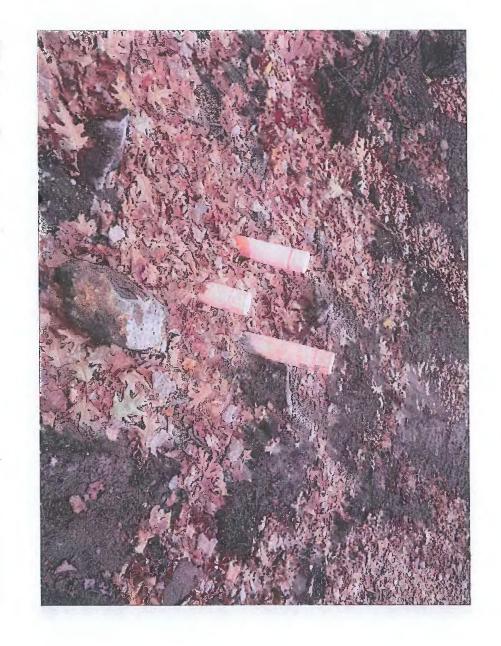
Picture 2 (IMGP0006.jpg)

estimated at 600 square feet. Pad for drill holes #06 - BIC - 001 and 06 - BIC - 002. The drill pad is



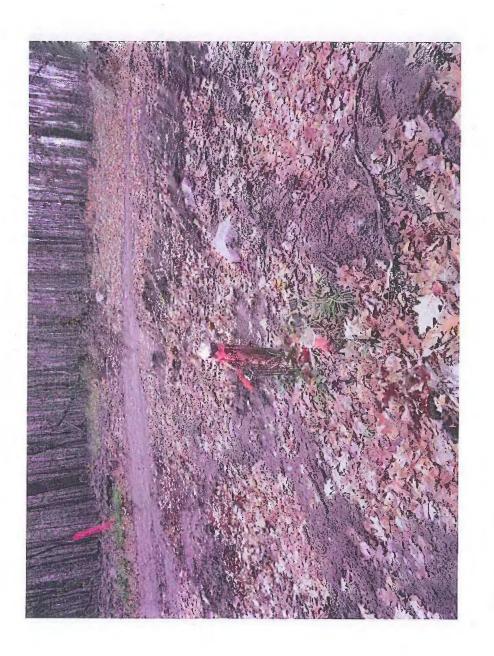
Picture 3 (IMGP0007.jpg)

Drill pad for holes #11 - BIC - 051 through 11 - BIC - 055. The drill pad is estimated at 0.2 acre. It is a leafy logging deck, a cleared area exposing dirt and tire tracks



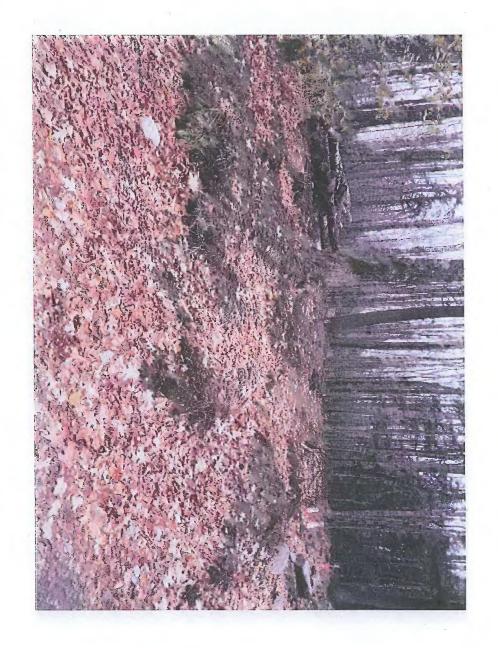
Picture 4 (IMGP0008.jpg)

dirt and tire tracks estimated at 0.2 acre. It is a leafy logging deck, a cleared area exposing Drill pad for holes #11 - BIC - 051 through 11 - BIC - 055. The drill pad is



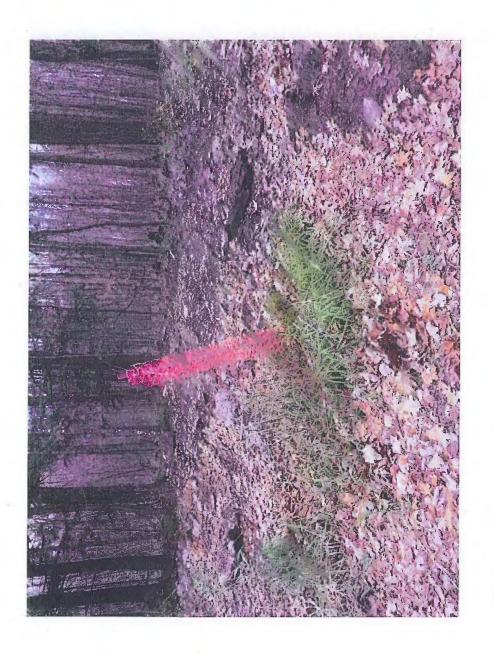
Picture 5 (IMGP0009.jpg)

Drill pad for holes #11 - BIC - 051 through 11 - BIC - 055. The drill pad is estimated at 0.2 acre. It is a leafy logging deck, a cleared area exposing dirt and tire tracks



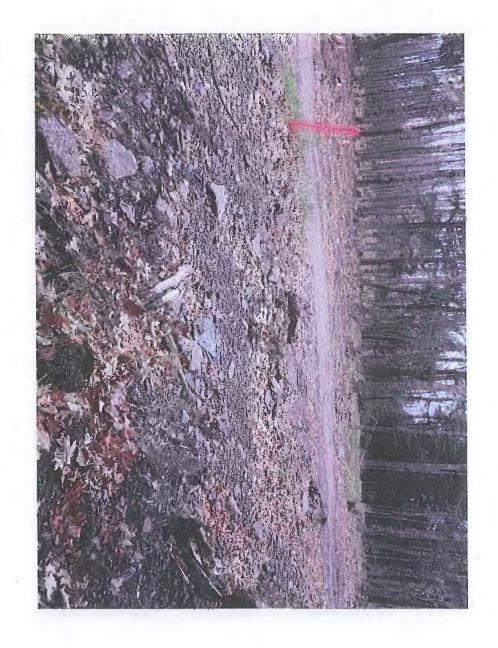
Picture 6 (IMGP0010.jpg)

estimated at 0.2 acre. It is a leafy logging deck, a cleared area exposing dirt and tire tracks. Drill pad for holes #11 - BIC - 051 through 11 - BIC - 055. The drill pad is



Picture 7 (IMGP0011.jpg)

Drill pad for holes #11 - BIC - 051 through 11 - BIC - 055. The drill pad is estimated at 0.2 acre. It is a leafy logging deck, a cleared area exposing dirt and tire tracks



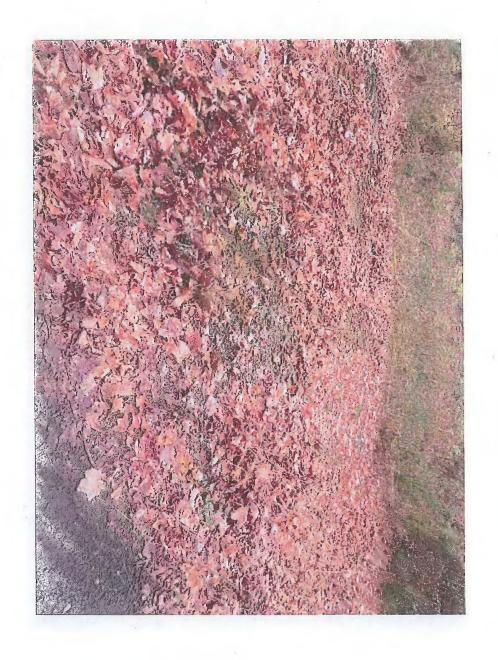
Picture 8 (IMGP0012.jpg)

exposed dirt and tire tracks. estimated at 0.2 acre. It is a leafy logging deck, a cleared area with Drill pad for holes #11 - BIC - 051 through 11 - BIC - 055. The drill pad is



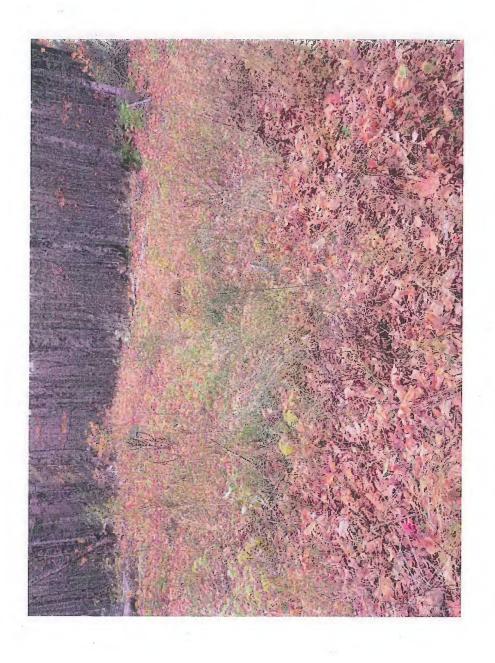
Picture 9 (IMGP0013.jpg)

Unidentified drill site. It is a vegetated logging deck, estimated at 0.2 acre.



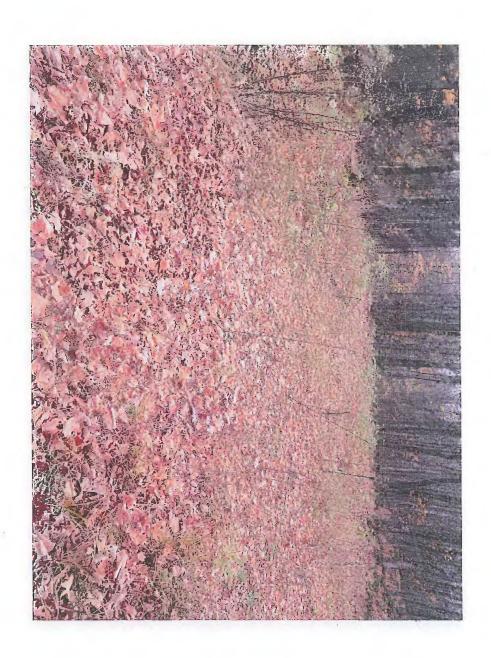
Picture 10 (IMGP0014.jpg)

600 square feet. Three holes on unidentified leafy, gravelly pad. The pad is estimated at



Picture 11 (IMGP0015.jpg)

Unidentified leafy and vegetated drill pad

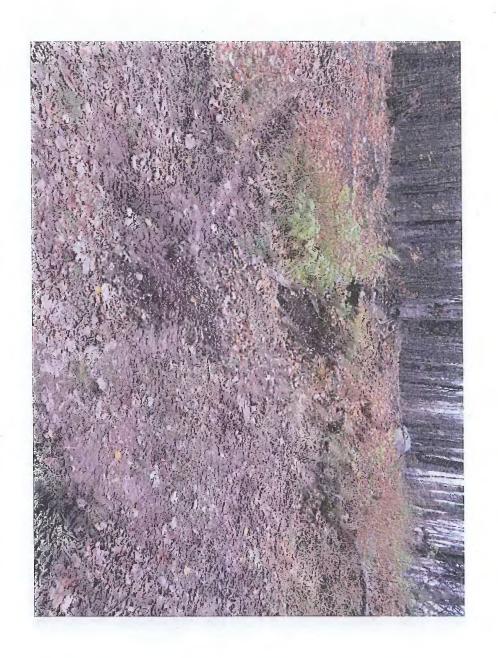


Picture 12 (IMGP0016.jpg)
Unidentified leafy and vegetated drill pad



Picture 13 (IMGP0017.jpg)

Unidentified leafy vegetated drill pad, with uprooted tree stumps. The drill pad is estimated at 800 square feet.



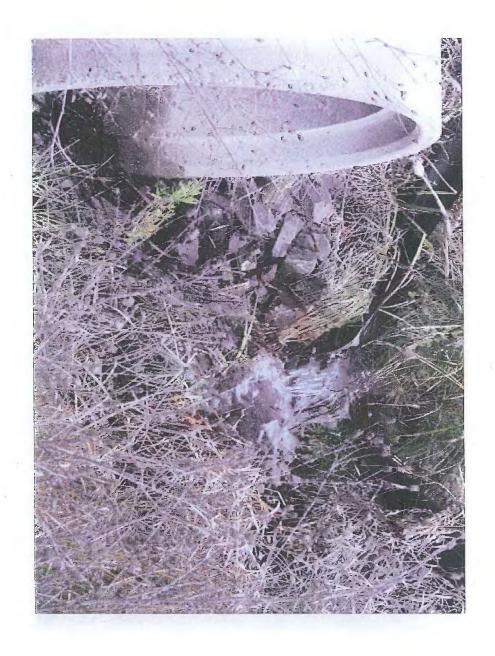
Picture 14 (IMGP0018.jpg)

feet. Muddy drill pad with tire tracks. The drill pad is estimated at 500 square



Picture 15 (IMGP0019.jpg)

Muddy drill pad with tire tracks. The drill pad is estimated at 500 square feet.



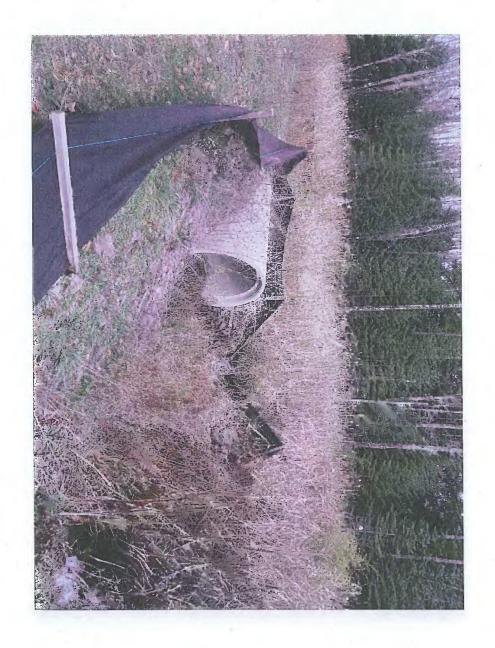
Picture 16 (IMGP0020.jpg)

culvert. The culvert is under an access road for the Bovine Igneous Complex site. Water from a beaver dam and wetland flowing over a silt fence into a



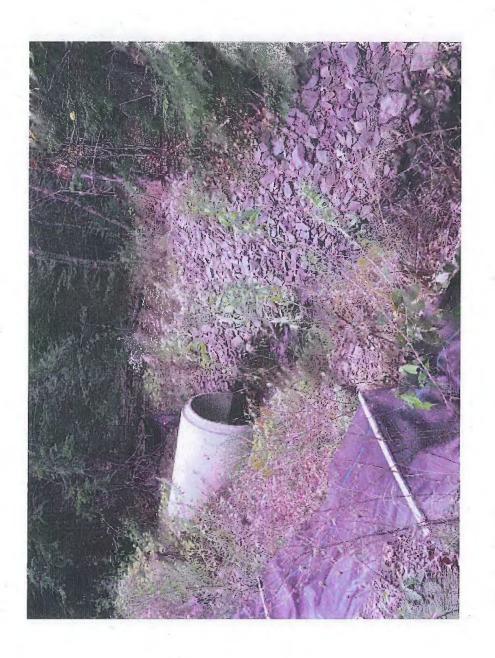
Picture 17 (IMGP0021.jpg)

Beaver dam and wetland adjacent to a Bovine Igneous Complex access road



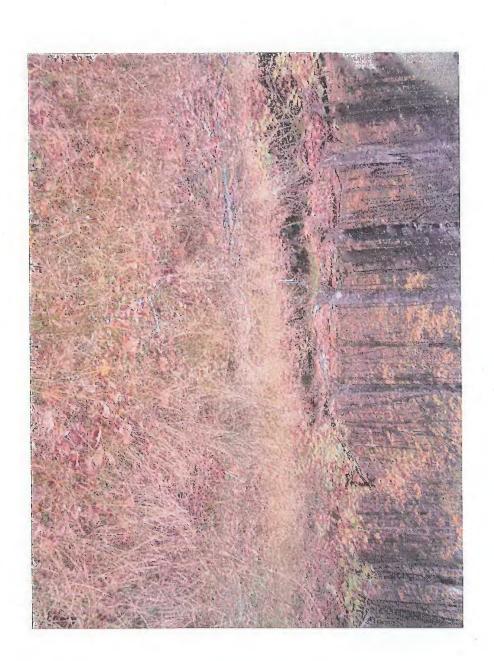
Picture 18 (IMGP0022.jpg)

the Bovine Igneous Complex site. fence crosses over the culvert. The culvert is under an access road for Culvert accepting flow from a beaver dam and wetland. A damaged silt



Picture 19 (IMGP0023.jpg)

Culvert discharging flow from a beaver dam and wetland. A damaged silt fence is near the culvert. The culvert is under an access road for the Bovine Igneous Complex site.



Picture 20 (IMGP0024.jpg)
Unidentified, vegetated drill pad

KEWEENAW BAY INDIAN COMMUNITY

2011 TRIBAL COUNCIL

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COPY

September 21, 2011

Ms. Tinka Hyde, Director Water Division EPA Region 5 77 West Jackson Boulevard (W-15J) Chicago, Illinois, 60604-3507

Re: NPDES Permit Required For Mineral Exploration Activities on the L'Anse Reservation

Dear Ms. Hyde,

In September, 2011, mineral exploration core drilling activities were conducted by a Rio-Tinto/Kennecott exploration contractor within the boundaries of the Keweenaw Bay Indian Community's L'Anse Reservation in Baraga County, Michigan. The property in which this exploration site is located is in Township 50N, Range 32W, Section 19, approximately 5 miles east-southeast of the Village of L'Anse.

We call to your attention the National Pollutant Discharge Elimination System (NPDES) Permit for Stormwater Discharges from Industrial Activities regulation of 2008, which include requirements for EPA NPDES permits for discharges from metallic mineral exploration core drilling activities.

It is our understanding that the contractor for Rio-Tinto/Kennecott has not obtained a NPDES permit for discharges for the mineral exploration core drilling activities that have been conducted on the L'Anse Reservation.

We have many concerns associated with these unpermitted exploration activities and would like to have a conference call with you and appropriate EPA staff to discuss applicable EPA regulations and requirements, oversight of these activities, permitting enforcement, and the consequences for unpermitted activities by these contractors operating on our Reservation.

LAKE SUPERIOR BAND OF CHIPPEWA INDIANS

"Home of the Midnight Two-Step Championship"

Attachment

Ms. Tinka Hyde September 19, 2011 Page 2 of 2

Considering the level of drilling activity at this mineral exploration location within the L'Anse Reservation, we request that this conference call take place at your earliest opportunity.

If you have any questions or to coordinate a conference call, please contact our Natural Resource Director, Todd Warner, at (906) 524-5757 x13.

Sincerely,

Warren Chris Swartz, Jr.

President

Brian Bell, EPA R5 Regional Storm Water Coordinator cc: Steve Roy, EPA R5 Mining Team Leader Jennifer Manville, EPA R5 Michigan Tribal Liaison

Susan LaFernier, KBIC Council Secretary

Todd Warner, KBIC Natural Resource Director



RE: Question about BIC drill holes

Ware, Andrew (KEMC) to: Newton Ellens

Cc: "Burley, Adam (KEMC)", "Johnson, Matt (KEMC)"

From:

"Ware, Andrew (KEMC)" < Andrew. Ware@riotinto.com>

To:

Newton Ellens/R5/USEPA/US@EPA

Cc:

"Burley, Adam (KEMC)" <Adam.Burley@riotinto.com>, "Johnson, Matt (KEMC)"

<Matthew.Johnson2@riotinto.com>

History:

This message has been replied to.

Hello Newton.

As discussed, below are the holes drilled by date and a description of their location

Year Hole ID # of holes

1995 BIC95-01 1 (close to top of hill near pad with the orange drill collars)

2001 BIC01-01 1 (top of hill west end)

2002 BIC02-01 2 (top of hill west end)

2003 03BIC005 1 (the pad I'd mentioned that lies in the center of the top of the hill)

03BW001-3 3 (At the car parking spot at the end of visit - bermed entrance)

03BW005-8 4 (west of Indian Road - no pad constructed- not visited)

2006 06BIC001-27 27 (small pad on the slope on the north side of hill 06BIC001-2 - second pad visited).

(Small pads on western end of hill where we drove to at the end of the visit and the western pads on top of hill where new trail was constructed – heading south)

2007 07BIC028-35

8 (small pads pushed of the logging track as we drove along the top on the north side of

the hill)

2008 08BIC035-50 15 (third pad visited - 1st one on top of hill with orange drill collars and the second pad on top of hill with no sign of drill collars (old log deck))

2011 11BIC051-57 7 (1st pad on top of hill with orange drill collars 51-55 and 1st stop where you parked your car, holes 56 and 57)

Total holes = 69

In terms of our site visit stops. The 1st pad where you parked your vehicle was used and reclaimed in 2011. The 1st hole drilled after September 29 2008 was hole 08BlC048. This hole is located on the 1st pad we visited on top of the hill where the orange painted drill collars were sticking out of the ground. 08BlC048-50 and 11BlC051-055 were drilled off that pad

Total disturbance after the September 29th, 2008 date was confined to the 1st pad where you parked your car (11BIC056-057) and the 1st pad on top of the hill (08BIC048-50 and 11BIC051-055) which in reality was a re-used pad from the 1st part of 2008 which was reused from 2001. Dates of holes drilled are supported by drillers field log

Attachment

-

11/15/2011 07:32 AM

sheets.

Let me know if you have further questions.

Regards

Andrew Ware Exploration Manager KEMC

----Original Message----

From: Ellens.Newton@epamail.epa.gov [mailto:Ellens.Newton@epamail.epa.gov]

Sent: Monday, November 14, 2011 3:39 PM

To: Ware, Andrew (KEMC)

Subject: Question about BIC drill holes

Hello Andrew,

After my inspection on 11/1, I have a few questions:

What are the identification numbers for each of the drill holes? You told me that Kennecott drilled 62 holes in the following years:

1995

2000

2001

2002

2007

2008

2010 2011

You also said that the drill hole numbers are identified by year:

Year	Drill hole numbers	1
2006	001-025	
2007	1026-035	ļ
2008	036-050 +	ı
2011	051-057	1

Could you straighten this out for me, for the purpose of my inspection?

Please call if you have any questions. Thanks.

Newton Ellens Environmental Engineer U.S. Environmental Protection Agency (WC-15J) 77 West Jackson Boulevard Chicago, Illinois 60604 (312) 353-5562

Avis:

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FW: BIC Data for EPA

Ware, Andrew (KEMC) to: Newton Ellens

Cc: "Henwood, Neville (RT Legal)", "Burley, Adam (KEMC)"

01/11/2012 04:46 PM

From:

"Ware, Andrew (KEMC)" < Andrew. Ware@riotinto.com>

To:

Newton Ellens/R5/USEPA/US@EPA

Co:

"Henwood, Neville (RT Legal)" <Neville.Henwood@riotinto.com>, "Burley, Adam (KEMC)"

<Adam.Burley@riotinto.com>

History:

This message has been forwarded.

Newton

Please find attached a data sheet for date and location of drill pads, drill holes and road construction and rehabilitation as per your request from last year.

If you require further information I would be happy to accommodate.

At this point in time there are no plans to return to the BIC exploration site. If this changes I will notify you of the updated plans and we can discuss permit issues and requirements.

Regards

Andrew Ware
Exploration Manager
Kennecott Eagle Minerals Company

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part, EPA Data.xlsx

Attachment

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